UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

September 19, 2007

REPLY TO THE ATTENTION OF:
SR-6J

Mr. Jerry C. Winslow
Principal Environmental Engineer
Xcel Energy
414 Nicollet Mall (Ren. Sq. 8)
Minneapolis, Minnesota 55401

RE: Additional comments to RI and HHRA
Ashland/NSP Lakefront Superfund Site

Dear Mr. Winslow:

Pursuant to the Administrative Order on Consent (AOC), CERCLA Docket No. V-W-04-C-764, the United States Environmental Protection Agency (EPA) requires Northern States Power Company (NSPW), (d.b.a. Xcel Energy) to make modifications to the August 31, 2007, version of the Remedial Investigation (RI) and the September 6, 2007, version of the Human Health Risk Assessment (HHRA) as provided below. NSPW is receiving the letter today, starting the 7 day clock to incorporate the comments provided below and submit the revised pages/figures by September 26, 2007.

Remedial Investigation

1. As part of the RI report, do you think that the site contamination boundaries might need to be re-drawn? For example, the residential area west of the Church property has not been impacted. It is recommended that a re-draw from Highway 2, north down 2nd Ave., west to the RR tracks and west to Ellis Ave. This would remove the un-impacted properties from the site contamination boundaries.

2. Figure 1-2 – The "underground clay tile remnants" needs to be stated "underground clay tile pipe remnants."

3. Figure 1-3 – This figure should include the clay tile pipe trace.

4. Figure 5-2 – The 100,000 ppb. There has been no "clean" area documented at St. Clarie Street or the RR tracks.

5. Figure 5-4 – The 10,000 ppb isoconcentration lines should be connected from the "court yard" through to the seep area. MW-2R had a total PAH concentration of 10,860 (3/17/05).

6. Figure 5-5 – The 1,000,0000 ppb isoconcentration lines should be connected from the "court yard" through to the seep/coal tar dump area.

7. Figure 5-7 – The "clay tile pipe" from the MGP location to the seep area needs to be included in this drawing.

Human Health Risk Assessment

1. **Page 1, Executive Summary** – The number of exposure pathways exceeding risk levels needs to be corrected as it appears below. This also should be adjusted in the conclusions chapter on page 7-1.
   "The results of the HHRA indicate that ***seven*** ~~five~~ exposure pathways result in estimated risks that exceed USEPA's target risk levels and ***eight*** ~~seven~~ exposure pathways result in estimated risks that are either equivalent to or exceed the WDNR threshold of an incremental cancer risk of one-in-one hundred thousand (1x 10-5). These exceedances are indicated below."

   Exposures to Sediments – The current HHRA does not address the recent 2+ foot drop in Lake Superior water levels and potential exposures to contaminated sediments at sample locations that were not included previously because they were beyond a specific depth, but now fall within that depth. As a result, additional sediment sample data may need to be brought into the exposure data set and risk calculations. This may be accomplished as an addendum to the HHRA or addressed in the Feasibility Study (FS) process.

In addition to the above correction, several comments and edits that the Department of Health previously made on the prior draft HHRA were not corrected or revised in the final HHRA, but needs to be. These are as follows:

2. **Page 2-4, Section 2.2.2 Sediment** – The risk assessment continues to cite the use of background sediment samples in calculation of risks, which is inappropriate. The previous comment was, "These are Background sediment samples and are NOT appropriate in evaluating site-specific risks from contaminated sediments." The sediment samples that still need to be excluded from the risk calculations are 2300N-3200E, NSP-SE-SS12, and NSP-SE-SS-13. The revised HHRA needs to confirm that this data was excluded from the data set and risk calculations.

3. **Page 3-6** – Under the heading Residential and Industrial/Commercial Land Use Scenarios, the following sentence still needs to be corrected. "Groundwater ***contamination*** is present in both a shallow aquifer and a confined deep aquifer."

4. **Page 6-2, Section 6.2.1 Residential Scenario Evaluation** – The unnamed table at the top of the page was not corrected and updated, as requested in the previous comment, which were, "For the residential CTE column, this must reference CTE Tables 35 and 36. The values listed here conflict with these tables. The correct values for the first row were inserted. The others need to be corrected."

5. **Page 6-2, 6.2.2 Indoor Air Evaluation** – The following sentence still needs to be corrected to address the previous comments, which are attached. "The chemicals

detected in indoor air samples include chemicals that may be associated with solvents rather than chemicals that have been associated with historic activities at the site." **Comment: Some VOCs found in indoor air are associated with MGP site wastes (benzene). This needs to be stated.**

The following sentence still needs to be corrected to address the previous comment, which is attached. "As a conservative measure, all chemicals detected in the indoor air samples were included in the quantitative evaluation and the results of the evaluation suggest that risks to residents are within acceptable USEPA limits..." **Comment: Data from table 19 needs to be presented and better discussed, including cancer risk.**

6. **Page 6-3, 6.2.3 Surface Water Evaluation** – The following sentence and related portions of the HHRA still needs to be corrected to address the previous comments, which is attached. "It was determined that because the 2005 (both high and low-energy data) did not confirm the presence of site-related chemicals in surface water at concentrations greater than the risk-based screening concentrations, the 1998 data were removed from consideration in the risk assessment." **Comment: It is not acceptable to remove the 1998 SEH data from calculations and risk estimates in this HHRA. The SEH data and findings must be incorporated into current risk calculations and estimates of this document.**

7. **Page 6-7, 6.3.5.2 Oily Material and Oil Slicks** – The following sentence and related portions of the HHRA still needs to be corrected to address the previous comments, which is attached. "Information regarding chemical-specific concentrations in oily water is unavailable because oily water (groundwater or surface water containing slicks) was not sampled during previous investigations..." **Comment: This is not correct. SEH 1998 data collected a single surface water sample that had elevated cPAHs. At a minimum, this sample under-estimates the concentrations and constituents of oily materials and slicks.**

8. **Page 6-11, 6.5.1.2 Surface Water** – The following sentence and related portions of the HHRA still needs to be corrected to address the previous comments and edits, which is attached. "For both the SEH HHRA and the current HHRA, measured surface water concentrations were used to evaluate risks to recreational receptors. The current HHRA used 2005 data that identified no COPCs in surface water, ~~and~~ ***but did not use the 1998 data that detected COPCs in surface water.*** ~~risks associated with the 1998 data were quantified for informational purposes, as discussed in Section 6.2.3.~~ **Comment: Again, this fails to take into account the 1998 surface water sample with elevated PAHs. This sample data must be included in the discussion and calculations of the current HHRA.**

In addition to these comments on the HHRA, sections of the RI report that incorporates portions of the HHRA needs to be updated to accurately and correctly reflect the findings and conclusions of the final HHRA.

If you have any questions, please contact me at (312) 886-1999.

Sincerely,

Scott K. Hansen
Remedial Project Manager

cc: Dave Trainor, Newfields
Jamie Dunn, WDNR
Omprakash Patel, Weston Solutions, Inc.
Henry Nehls-Lowe, DHFS
Ervin Soulier, Bad River Band of the Lake Superior Chippewa
Melonee Montano, Red Cliffe Band of the Lake Superior Chippewa